

Philip Giudice, Commissioner
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Re: Alternative Energy Portfolio Standard Reply Comments

Dear Commissioner Giudice,

Ze-gen, Inc. would like to respond to the comments posted concerning the implementation of the Massachusetts' Alternative energy Portfolio Standards ("APS"). Ze-gen would like to reiterate our support for the recommendation that the APS guidelines should be heavily based on stringent emissions standards, as supported by various stakeholders including the Conservation Law Foundation, Environment Northeast, and the Massachusetts Climate Coalition. Relying on emissions standards, including standards for carbon dioxide emissions, allows the APS program to be technology neutral and maintains the focus on the laudable environmental and energy goals of the Commonwealth. If technologies become available that can gasify fuels with minimal carbon dioxide emissions, or can derive energy from any biogenic carbon-based waste product with little to no toxic emissions, these should be aggressively promoted in the APS as desirable sources of alternative energy for Massachusetts.

As a waste gasification company with a technology demonstration facility in Massachusetts, Ze-gen urges the Commonwealth to distinguish between coal gasification and waste gasification, as different feedstocks cause exceedingly different carbon dioxide emissions profiles. Advanced gasification technologies can process post-recycled, residual material derived from construction and demolition debris and other organic waste products into forms of energy in an environmentally sustainable manner. Gasification of waste reduces greenhouse gas emissions on two fronts: the first is the avoidance of landfill methane, which would have been produced by the breakdown of these waste streams in a landfill; the second is the avoidance of burning fossil fuels for energy production. Gasification as a technology type should not be eliminated from the APS, but rather each unique gasification company should be evaluated based on their emissions profile and environmental merit.

Respectfully Submitted,

Megan Feldt
Director of Regulatory & Community Affairs
Ze-gen, Inc.